

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE: BPS DIRECT, LLC and CABELA'S, LLC, WIRETAPPING</b>	<b>MDL NO. 3074 2:23-md-03074-MAK</b>
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**DEFENDANTS' UNOPPOSED MOTION FOR THE  
PRO HAC VICE ADMISSION OF JASON K. WARD**

Erin (Loucks) Leffler, counsel for Defendants BPS Direct, LLC and Cabela's, LLC in Case No. 2:23-md-03074-MAK, and a member in good standing before this Court, hereby moves for the admission and appearance in this case of co-counsel, Jason K. Ward, *Pro Hac Vice*. Mr. Ward is a member in good standing before the following courts:

1. State of Kansas (Admitted 1999 – Bar No. 19293)
2. State of Missouri (Admitted 2000 – Bar No. 51735)
3. USDC Western District of Missouri (Admitted 2000)

In addition, Mr. Ward is of good moral character and professional reputation. An affidavit of Mr. Ward in support hereof is filed herewith.

Defendants require the special admission of Mr. Ward because of Mr. Ward's understanding of the legal and factual issues present in this case. Mr. Ward has been heavily involved with Defendants' Opposition to Plaintiffs' Motion to Compel Production of Session Data (ECF No. 76).

The undersigned affirms her ongoing obligations and responsibilities in this Action, including those set forth in Section I.K of Judge Kearney's Policies.

The undersigned has conferred with counsel for Plaintiffs and there is no opposition to this Motion.

November 13, 2023

Respectfully Submitted,

By: /s/ Erin L. Leffler  
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